

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

UNITED STATES DISTRICT COURT

for the

District of

South Carolina

Division

Jason Ray Clark

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Michael Ray Trisler

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Case No. 2:24-cv-01275-DCN-MHC

(to be filled in by the Clerk's Office)

Jury Trial: (check one) ☒ Yes ☐ No

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address

Jason Ray Clark

9419 Twenty Mile Road #112

Parker, Douglas

CO, 80134

720.255.5711

jason@clarkbrothersinvestments.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

2024 MAR 15 AM 9:27
U.S. DISTRICT COURT
SOUTH CAROLINA

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

Defendant No. 1

Name

Job or Title *(if known)*

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address *(if known)*

Michael Ray Trisler
Stuntman, Real Estate
2370 Sol Legare Road
Charleston, Charleston
SC, 29412
808.348.0888
tris808@gmail.com

Defendant No. 2

Name

Job or Title *(if known)*

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address *(if known)*

Defendant No. 3

Name

Job or Title *(if known)*

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address *(if known)*

Defendant No. 4

Name

Job or Title *(if known)*

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address *(if known)*

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

☐ Federal question

☒ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

B. If the Basis for Jurisdiction Is Diversity of Citizenship**1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, *(name)* Jason Ray Clark, is a citizen of the
State of *(name)* Colorado.

b. If the plaintiff is a corporation

The plaintiff, *(name)* _____, is incorporated
under the laws of the State of *(name)* _____,
and has its principal place of business in the State of *(name)* _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)**a. If the defendant is an individual**

The defendant, *(name)* Michael Ray Trisler, is a citizen of
the State of *(name)* South Carolina. Or is a citizen of
(foreign nation) _____.

b. If the defendant is a corporation

The defendant, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____.

Or is incorporated under the laws of (foreign nation) _____, and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

\$25,000,000.

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

SEE attached.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

SEE attached.

III. Statement of Claim.

Charges: Defamation of Character and Emotional Distress.

Michael Ray Trisler is accusing me, pro se plaintiff Jason Ray Clark, of defamation and painting Mr. Trisler in a false light in a counterclaim lawsuit in the State of Hawaii case #1:22-cv-00559-JAO-KJM. The statements, claims, and verbal testimony of Mr. Trisler before, during, and ongoing are all factually inaccurate, and defamatory towards Jason Ray Clark. Mr. Trisler lies, cheats, and steals constantly with ease, without any regret, remorse, or concern for his numerous victims. Jason Ray Clark knows of more than 10+ victims of the swindling con artist Michael Ray Trisler. Plaintiff Jason Ray Clark has personally known Michael Ray Trisler for more than 30+ years. We met at WEST POINT (1988 timeframe). However, it wasn't up until the most recent business dealings of which Plaintiff Jason Ray Clark is suing Michael Ray Trisler (and his brother Brian Paul Trisler in separate cases in Hawaii Federal Court case #1:22-cv-00559-JAO-KJM and case #1:23-cv-00293-DKW-KJM) that Plaintiff Jason Ray Clark realized Michael Ray Trisler is a conman, grifter, swindler, fraudster, deadbeat, and habitual liar. There are numerous documented fact-based specific examples of Michael Ray Trisler lying, cheating, stealing, duping, and deceiving unsuspecting victims in his narcissistic web of deceit, back peddling, and straight up illegal business activities only to enhance his own financial interests off the ideas, hard work, and life savings of his victims-see Plaintiff Jason Ray Clark. More specifically, more than 30+ eyewitnesses will testify to this court on behalf of Jason Ray Clark that Mike Trisler is lying and defaming Plaintiff Jason Ray Clark. These lies are damaging the A+ stellar reputation of Jason Ray Clark and painting a false light to the public, numerous WEST POINT classmates and alumni, mutual life-long friends, and families of both the Trisler's and the Clark's, as well as numerous others in the entirety of the same circles that Mr. Trisler and Mr. Clark belong to (including Hollywood, the Military, Hawaii, Jui Jitsu brothers/sisters, and most poignantly WEST POINT). This is even more damaging and egregious as Jason Ray Clark is an Investment Advisor. In the world of investment advisory TRUST is number one. Without TRUST no one will ever entrust an investment advisor with their hard earned life savings. This is well known to the general public and within the investment community. Michael Ray Trisler's false and defamatory accusations have already cost Plaintiff Jason Ray Clark numerous clients, lost business revenue, as well as permanently damaging any future revenue streams from the mutual communities we are part of. On top of all of these factual, documented, and undeniable defamatory statements, testimony, and purely made up stories; these actions by Mr. Trisler have caused enormous, documented, indisputable emotional trauma and distress for the VICTIM in all of this, pro se Plaintiff, Jason Ray Clark. Defamation is real, permanent, and a lifelong stain that NEVER goes away, thus the justification for the amount of damages in this case, \$25,000,000.

IV. Relief.

\$25,000,000.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 3/8/2024

Signature of Plaintiff

Printed Name of Plaintiff

Jason R. Clark

Jason Ray Clark

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address